

ORIGINAL

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

-----X
STATE OF NEW YORK, *et al.*,

Plaintiffs,

-against-

STEPHEN L. JOHNSON, *et al.*,

Defendants.
-----X

Case No. 1:07-cv-10632-BSJ-DCF

**NOTICE OF MOTION
TO ADMIT COUNSEL
TRICIA K. JEDELE
PRO HAC VICE**

PLEASE TAKE NOTICE that, upon the annexed declaration of movant, Andrew G. Frank, Assistant Attorney General in the Environmental Protection Bureau of the office of Andrew M. Cuomo, Attorney General of the State of New York, in support of this motion, and upon the declaration of Tricia K. Jedele, as applicant for admission *pro hac vice*, and upon the certification of good standing of the Supreme Court of Rhode Island, the undersigned will move this Court before the Honorable Barbara S. Jones, United States District Judge, at the United States Courthouse for the Southern District of New York located at 500 Pearl Street, New York, NY, 10007, pursuant to Rule 1.3 (c) of the Local Rules of the United States District Courts for the Southern and Eastern Districts of New York, for an Order allowing the admission of said Tricia K. Jedele, Special Assistant Attorney General and Environmental Advocate of the State of Rhode Island and a member in good standing of the Bar of the State of Rhode Island, as attorney *pro hac vice* to argue or try this case in whole or in part as counsel. Movant Andrew G. Frank will act as local counsel for the applicant.

Dated: New York, New York
July 10, 2008

A. G. Frank

Andrew G. Frank
Assistant Attorney General
Environmental Protection Bureau
ANDREW M. CUOMO
Attorney General of the State of New York
120 Broadway, 26th Floor
New York, NY 10271
Telephone: (212) 416-8271
Facsimile: (212) 416-6007

-----X

STATE OF NEW YORK, *et al.*,

Plaintiffs,

-against-

STEPHEN L. JOHNSON, *et al.*,

Defendants.

-----X

**DECLARATION OF ANDREW G. FRANK IN SUPPORT OF MOTION TO
ADMIT TRICIA K. JEDELE AS COUNSEL *PRO HAC VICE***

4. As set forth in the annexed declaration of Tricia K. Jedele and the exhibit thereto:

(i) Tricia K. Jedele is a member in good standing of the Bar of the State of Rhode Island.

(ii) There are no pending disciplinary proceedings against Tricia K. Jedele in any State or Federal Court.

5. I agree to act as local counsel to the applicant for admission *pro hac vice* during the pendency of this action. My address is: Andrew G. Frank, Assistant Attorney General, Environmental Protection Bureau, Office of Andrew M. Cuomo, Attorney General of the State of New York, 120 Broadway, New York, NY 10271. My telephone number is (212) 416-8271 and my fax number is (212) 416-6007. My e-mail address is andrew.frank@oag.state.ny.us.

6. The required fee of \$25.00 accompanies this motion in accordance with the Local Rules of this Court.

7. A proposed Order granting this motion is annexed hereto.

8. No previous application has been made for the relief sought in this motion.

WHEREFORE I respectfully request that Tricia K. Jedele be admitted as counsel *pro hac vice* for plaintiff State of Rhode Island in this action.

I declare under penalty of perjury that the foregoing is true and correct.

Dated: New York, New York
July 10, 2008

At G. R. L.
Andrew G. Frank
Assistant Attorney General
Environmental Protection Bureau
ANDREW M. CUOMO
Attorney General of the State of New York
120 Broadway, 26th Floor
New York, NY 10271
Telephone: (212) 416-8271
Facsimile: (212) 416-6007

ORIGINAL

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

| | | |
|-------------------------------------|---|--------------------------------|
| -----X | : | |
| STATE OF NEW YORK, <i>et al.</i> , | : | |
| | : | |
| Plaintiffs, | : | Case No. 1:07-cv-10632-BSJ-DCF |
| | : | |
| -against- | : | |
| | : | |
| STEPHEN L. JOHNSON, <i>et al.</i> , | : | |
| | : | |
| Defendants. | : | |
| -----X | : | |

DECLARATION OF TRICIA K. JEDELE
IN SUPPORT OF MOTION TO BE ADMITTED *PRO HAC VICE*

Tricia K. Jedele, being of legal age and pursuant to 28 U.S.C. § 1746, deposes and says:

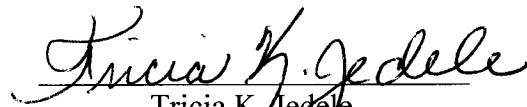
1. I am an attorney duly admitted to practice in the State of Rhode Island since November 6, 1998.
2. I am currently employed as a Special Assistant Attorney General and Environmental Advocate in the State of Rhode Island Office of the Attorney General, where I have been continuously employed since January 1999.
3. Attached hereto as Exhibit A is a Certificate of Good Standing issued by the Supreme Court of Rhode Island, dated June 20, 2008, reflecting that I am currently a member in good standing of the Bar of the State of Rhode Island.
4. There are no pending disciplinary proceedings against me in any State or Federal Court.

5. Pursuant to the accompanying motion, I hereby request permission to appear as counsel *pro hac vice* for the State of Rhode Island in this action. Andrew G. Frank, Assistant Attorney General, Environmental Protection Bureau, Office of Andrew M. Cuomo, Attorney General of the State of New York, 120 Broadway, New York, NY 10271 is and shall remain local counsel in this action.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on

7/2/08


Tricia K. Jedele

RHODE ISLAND SUPREME COURT

Office of the Clerk

www.courts.state.ri.us



Licht Judicial Complex
250 Benefit Street
Providence, RI 02903
401-222-3272
Fax: 401-222-3599

TRICIA K. JEDELE
DEPARTMENT OF ATTORNEY GENERAL
150 SOUTH MAIN STREET
PROVIDENCE, RI 02903

This certifies that TRICIA K. JEDELE of PROVIDENCE, RHODE ISLAND, is an Attorney and Counselor of the Supreme Court of the State of Rhode Island, and as such was on 06-NOV-1998 admitted to practice in all the Courts of said State, as appears of record in this the office of the clerk of the Supreme Court of said State and is in good standing and qualified to practice in said Courts. The Supreme Court is the highest Court in the State.

Given under my hand and the seal of said Supreme Court
at Providence, on June 20, 2008.


CLERK

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

| | | |
|-------------------------------------|---|--------------------------------|
| -----X | | |
| STATE OF NEW YORK, <i>et al.</i> , | : | |
| | : | |
| Plaintiffs, | : | Case No. 1:07-cv-10632-BSJ-DCF |
| | : | |
| -against- | : | |
| | : | |
| STEPHEN L. JOHNSON, <i>et al.</i> , | : | |
| | : | |
| Defendants. | : | |
| -----X | | |

**ORDER GRANTING MOTION TO
ADMIT TRICIA K. JEDELE AS COUNSEL *PRO HAC VICE***

UPON the motion of Andrew G. Frank made pursuant to Rule 1.3 (c) of the Local Rules of the United States District Courts for the Southern and Eastern Districts of New York to admit Tricia K. Jedele, an attorney admitted to practice in the State of Rhode Island, as counsel *pro hac vice* for plaintiff State of Rhode Island in this action, and the Court having considered said motion, it is hereby

ORDERED that the motion is granted and that Tricia K. Jedele is hereby admitted as counsel *pro hac vice* for plaintiff State of Rhode Island in this action. Andrew G. Frank, Assistant Attorney General, Environmental Protection Bureau, Office of Andrew M. Cuomo, Attorney General of the State of New York, 120 Broadway, New York, NY 10271 is designated as local counsel.

Dated: New York, New York
this ____ day of _____, 2008.

THE HONORABLE BARBARA S. JONES
UNITED STATES DISTRICT JUDGE

| | | |
|-------------------------------------|---|--------------------------------|
| -----X | : | |
| STATE OF NEW YORK, <i>et al.</i> , | : | |
| | : | Case No. 1:07-cv-10632-BSJ-DCF |
| Plaintiffs, | : | |
| | : | |
| -against- | : | CERTIFICATE OF SERVICE |
| | : | |
| STEPHEN L. JOHNSON, <i>et al.</i> , | : | |
| | : | |
| Defendants. | : | |
| -----X | : | |

EDMUND G. BROWN JR.,
ATTORNEY GENERAL OF THE STATE
OF CALIFORNIA
James R. Potter
Deputy Attorney General
California Office of the Attorney General
300 South Spring Street
Los Angeles, California 90013-1230

RICHARD BLUMENTHAL
ATTORNEY GENERAL OF THE STATE
OF CONNECTICUT
Mary K. Lenehan
Assistant Attorney General
Connecticut Office of the Attorney General
55 Elm Street, P.O. Box 120
Hartford, Connecticut 06141-0120

LISA MADIGAN
ATTORNEY GENERAL OF THE STATE
OF ILLINOIS
Gerald T. Karr
Senior Assistant Attorney General
Illinois Attorney General's Office
69 West Washington Street, Suite 1800
Chicago, Illinois 60602

G. STEVEN ROWE
ATTORNEY GENERAL OF THE STATE
OF MAINE
Janet M. McClintock
Assistant Attorney General
Maine Office of the Attorney General
6 State House Station
Augusta, Maine 04333-0006

MARTHA COAKLEY
ATTORNEY GENERAL OF THE
COMMONWEALTH OF
MASSACHUSETTS
I. Andrew Goldberg
Assistant Attorney General
Massachusetts Office of the Attorney General
One Ashburton Place
Boston, Massachusetts 02108

LORI SWANSON
ATTORNEY GENERAL OF THE STATE
OF MINNESOTA
Carla Heyl
Assistant Attorney General
Minnesota Office of the Attorney General
900 Bremer Tower
445 Minnesota Street
St. Paul, Minnesota 55101

KELLY A. AYOTTE
ATTORNEY GENERAL OF THE STATE
OF NEW HAMPSHIRE
Maureen D. Smith
Senior Assistant Attorney General
New Hampshire Office of the Attorney
General
33 Capitol Street
Concord, New Hampshire 03301-6397

ANNE MILGRAM
ATTORNEY GENERAL OF THE STATE
OF NEW JERSEY
Michael Schuit
Deputy Attorney General
New Jersey Office of the Attorney General
Richard J. Hughes Justice Complex
25 Market Street, P.O. Box 093
Trenton, New Jersey 08625-0093

SUSAN SHINKMAN
CHIEF COUNSEL, COMMONWEALTH
OF PENNSYLVANIA, DEPARTMENT OF
ENVIRONMENTAL PROTECTION
Robert A. Reiley
Assistant Counsel
Pennsylvania Department of Environmental
Protection
400 Market Street
Harrisburg, Pennsylvania 17105

PATRICK C. LYNCH,
ATTORNEY GENERAL OF
THE STATE OF RHODE ISLAND
Tricia K. Jedele
Special Assistant Attorney General
and Environmental Advocate
Rhode Island Office of the Attorney General
150 South Main Street
Providence, Rhode Island 02903

WILLIAM H. SORRELL
ATTORNEY GENERAL OF THE STATE
OF VERMONT
Kevin O. Leske
Assistant Attorney General
Vermont Office of Attorney General
109 State Street
Montpelier, Vermont 05609-1001

At G. Frank

Andrew G. Frank

UNITED STATES DISTRICT COURT
FOR THE
SOUTHERN DISTRICT OF NEW YORK

SILVERMAN PARTNERS, LP,

Index No.: 08 CV 3103

Plaintiff,

MOTION TO ADMIT COUNSEL
PRO HAC VICE

-against-

THE VEROX GROUP, KENNETH HOWLETT
and WILLIAM EDWARDS,

Defendants.

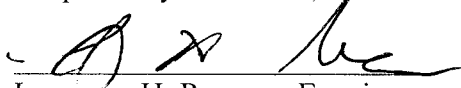
PURSUANT TO RULE 1.3(c) of the Local Rules of the United States District Courts for the Southern and Eastern Districts of New York, I, Laurence H. Pearson, Esquire a member in good standing of the bar of this Court, hereby move for an Order allowing the admission pro hac vice of

Christopher N. Hug
The Law Office of Christopher Hug, PC
21 Merchants Row, Third Floor
Boston, MA 02109
(T) 617/227-0400
(F) 617/227-0488

Christopher N. Hug is a member in good standing of the Bar of the State of Massachusetts. There are no pending disciplinary proceedings against Christopher N. Hug in any State or Federal court.


July 10, 2008
New York, New York

Respectfully submitted,

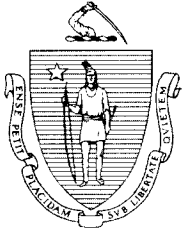

Laurence H. Pearson, Esquire
305 Broadway, Suite 900
New York, New York 10007
(212) 879-5840

Application for Pro Hac Vice
**GRANTED. The Clerk is
instructed to close this motion.**

SO ORDERED.


Hon. Harold Baer, U.S.D.J.
Date: 7/10/08

RECEIVED
JUL 10 2008
U.S. DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK



The Commonwealth of Massachusetts
SUPREME JUDICIAL COURT
FOR SUFFOLK COUNTY
JOHN ADAMS COURTHOUSE
ONE PEMBERTON SQUARE, SUITE 1300
BOSTON, MASSACHUSETTS 02108-1707

MAURA S. DOYLE
CLERK
(617) 557-1180

July 1, 2008

ASSISTANT CLERKS
LILLIAN C. ANDRUSZKIEWICZ (617) 557-1184
GEORGE E. SLYVA (617) 557-1185
ERIC B. WETZEL (617) 557-1186
FACSIMILE (617) 557-1033

Christopher Noel Hug
21 Merchants Row, 3rd Fl.
Boston, MA 02109

IN RE: CERTIFICATE OF ADMISSION AND GOOD STANDING

Christopher Noel Hug:

Enclosed please find the Certificate of admission and good standing which you have recently requested from this office. This certificate attests to your date of admission and good standing at the Bar of the Commonwealth of Massachusetts.

If you have any questions or if this office can be of further assistance, please do not hesitate to contact us at 617-557-1050 or visit our web site at www.sjccountyclerk.com.

Very truly yours,

A handwritten signature in black ink, appearing to read "Maura S. Doyle".

MAURA S. DOYLE
Clerk
Supreme Judicial Court

MSD/ces
CL Received: July 1, 2008
enclosure

COMMONWEALTH OF MASSACHUSETTS

SUFFOLK, SS.

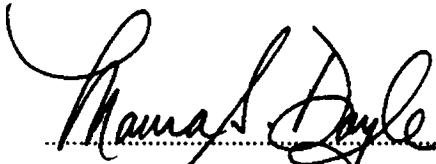
BE IT REMEMBERED, that at the Supreme Judicial Court holden at Boston within and for said County of Suffolk, on the **seventeenth** day of **December** A.D. **1985**, said Court being the highest Court of Record in said Commonwealth:

Christopher Noel Hug

being found duly qualified in that behalf, and having taken and subscribed the oaths required by law, was admitted to practice as an Attorney, and, by virtue thereof, as a Counsellor at Law, in any of the Courts of the said Commonwealth: that said Attorney is at present a member of the Bar, and is in good standing according to the records of this Court*.

In testimony whereof, I have hereunto set my hand and affixed the seal of said Court, this **first** day of **July** in the year of our Lord **two thousand and eight**.




MAURA S. DOYLE, Clerk

* Records of private discipline, if any, such as a private reprimand imposed by the Board of Bar Overseers or by any court, are not covered by this certification.

UNITED STATES DISTRICT COURT
FOR THE
SOUTHERN DISTRICT OF NEW YORK

SILVERMAN PARTNERS, LP,

Index No.: 08 CV 3103

Plaintiff,

-against-

THE VEROX GROUP, KENNETH HOWLETT
and WILLIAM EDWARDS,

ORDER FOR ADMISSION
PRO HAC VICE
ON WRITTEN MOTION

Defendants.

Upon the motion of Laurence Pearson, attorney for The Verox Group, Kenneth Howlett and William Edwards,

IT IS HEREBY ORDERED that

Christopher N. Hug
The Law Office of Christopher Hug, PC
21 Merchants Row, Third Floor
Boston, MA 02109
(T) 617/227-0400
(F) 617/227-0488
hug873@msn.com

is admitted to practice pro hac vice as counsel for Verox Group, Kenneth Howlett and William Edwards in the above captioned case in the United States District Court for the Southern District of New York. All attorneys appearing before this Court are subject to the Local Rules of this Court, including the Rules governing discipline of attorneys. If this action is assigned to the Electronic Case Filing (ECF) system, counsel shall immediately apply for an ECF password at nysd.uscourts.gov. Counsel shall forward the pro hac vice fee to the Clerk of Court.

Dated:
City, State:

Judge Harold Baer, United States District Court